

1 THE HONORABLE JAMES L. ROBART
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 DALE STRAWN,

11 Plaintiff,

12 v.

13 HAL NEDERLAND N.V., a Curacao
corporation; HOLLAND AMERICA LINE
N.V., a Curacao Corporation; HOLLAND
AMERICA LINE, INC., a Washington
corporation; HOLLAND AMERICA LINE-
USA, INC., a Delaware corporation; STEINER
MANAGEMENT SERVICES, LLC a Florida
Limited Liability Company; STEINER
TRANSOCEAN, LTD., a Bahama Corporation;
STEINER TRANSOCEAN, U.S., INC., a
Florida Company; and UNKNOWN
DEFENDANTS 1-4.,

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20 Defendants.

No. 2:16-cv-00214-JLR

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23 **STIPULATED MOTION TO
CONTINUE REBUTTAL EXPERT AND
DISCOVERY DEADLINES ON THE
ISSUE OF MEDICAL BILLING
[PROPOSED] ORDER**


NOTE ON MOTION CALENDAR:
June 5, 2017

MOTION

The parties respectfully request a continuation of deadlines related to the rebuttal
medical billing expert report and discovery on the issue of medical billing by thirty days.

STIPULATED MOTION TO CONTINUE REBUTTAL EXPERT
AND DISCOVERY DEADLINES ON THE ISSUE OF MEDICAL
BILLING [PROPOSED] ORDER
No. 2:16-cv-00214-JLR – Page 1

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Due to the extensive medical billing documents, Defendants have not been able to find a rebuttal expert who can meet the rebuttal expert report deadline of June 9, 2017. The parties state that this Stipulated Motion to continue deadlines is not required due to any lack of diligence on the part of any party or counsel.

The parties limit the discovery deadline extension to only reports and discovery on the issue of medical billing. All other rebuttal reports will be submitted by June 9, 2017. All other discovery will be completed by July 10, 2017. None of the Court's other deadlines will be affected by the extension.

The parties are expected to mediate this case on July 14, 2017.

STIPULATION

The parties hereby stipulate to a continuance of the rebuttal medical billing expert report deadline from June 9, 2017 to June 30, 2017. Additionally, the parties stipulate to a continuance of discovery related to the issue of medical billing from July 10, 2017 to August 9, 2017.

DATED this 5th day of June, 2017.

s/Louis A. Shields

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**STIPULATED MOTION TO CONTINUE REBUTTAL EXPERT
AND DISCOVERY DEADLINES ON THE ISSUE OF MEDICAL
BILLING [PROPOSED] ORDER**

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1 s/Charles Moure (via email authorization) s/Wayne Mitchell (via email authorization)
2 CHARLES MOURE, WSBA # 23701 WAYNE MITCHELL, WSBA # 24347
3 Moure Law, PLLC Anderson & Mitchell, PLLC
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5 Seattle, WA 98101 Seattle, WA 98104
6 Attorneys for Plaintiff Attorneys for Plaintiff
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STIPULATED MOTION TO CONTINUE REBUTTAL EXPERT
AND DISCOVERY DEADLINES ON THE ISSUE OF MEDICAL
BILLING [PROPOSED] ORDER
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~~PROPOSED~~ ORDER

It is so ordered.

DATED this 6th day of June, 2017.

THE HONORABLE JAMES L. ROBART
UNITED STATES DISTRICT JUDGE
WESTERN DISTRICT OF WASHINGTON

Presented by:

NIELSEN SHIELDS, PLLC

By: s/ Louis A. Shields

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**STIPULATED MOTION TO CONTINUE REBUTTAL EXPERT
AND DISCOVERY DEADLINES ON THE ISSUE OF MEDICAL
BILLING [PROPOSED] ORDER**

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206 728 1300

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2 CERTIFICATE OF SERVICE
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4 I hereby certify that on June 5, 2017, I electronically filed the
5 foregoing with the Clerk of the Court using the CM/ECF system,
6 which will send notification of such filing to the following:
7

8 Charles Moure, Esq.
9 Moure Law, PLLC
10 1700 Seventh Avenue, Suite 2200
11 Seattle, WA 98101

12 Wayne Mitchell, Esq.
13 Anderson & Mitchell, PLLC
14 100 S. King St., Suite 560
15 Seattle, WA 98104

16 I certify under penalty of perjury under the laws of the State of
17 Washington that the foregoing is true and correct.

18 Signed at Seattle, Washington.

19 _____
20 Sheila Baskins
21 Legal Assistant
22 1000 Second Avenue, Suite 1950
23 Seattle, Washington 98104
24 Telephone: 206-728-1300
25 Facsimile: 206-728-1302
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